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**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

BLOCKFI INC., *et al.*,

Debtors.¹

Chapter 11

Case No. 22-19361 (MBK)

(Jointly Administered)

**NOTICE OF DEBTORS' PROPOSED ENTRY INTO A LOAN
SETTLEMENT AGREEMENT WITH BACKBONE MINING
SOLUTIONS LLC PURSUANT TO THE ORDER GRANTING DEBTORS'
MOTION FOR ENTRY OF AN ORDER (I) AUTHORIZING THE
DEBTORS TO CONTINUE SERVICING AND ADMINISTRATION
ACTIVITIES IN THE ORDINARY COURSE OF BUSINESS WITH
RESPECT TO THE DEBTORS' INSTITUTIONAL LOAN PORTFOLIO
AND GRANTING RELATED RELIEF AND (II) AUTHORIZING AND
ESTABLISHING PROCEDURES REGARDING THE RESTRUCTURING,**

¹ The Debtors in these Chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: BlockFi Inc. (0015); BlockFi Trading LLC (2487); BlockFi Lending LLC (5017); BlockFi Wallet LLC (3231); BlockFi Ventures LLC (9937); BlockFi International Ltd. (N/A); BlockFi Investment Products LLC (2422); BlockFi Services, Inc. (5965) and BlockFi Lending II LLC (0154). The location of the Debtors' service address is 201 Montgomery Street, Suite 263, Jersey City, NJ 07302.

**SETTLEMENT, OR OTHER MODIFICATIONS OF INSTITUTIONAL
LOANS AND LOAN OBLIGATIONS**

PLEASE TAKE NOTICE that pursuant to the terms of the *Order Granting Debtors' Motion for Entry of an Order (I) Authorizing the Debtors to Continue Servicing and Administration Activities in the Ordinary Course of Business with Respect to the Debtors' Institutional Loan Portfolio and Granting Related Relief and (II) Authorizing and Establishing Procedures Regarding the Restructuring, Settlement, or Other Modifications of Institutional Loans and Loan Obligations* [Docket No. 299] (the "Settlement Procedures Order"),² the Debtors, subject to entry of an order consistent with the Settlement Procedures Order, have entered into a proposed Termination and Payoff Agreement (the "Proposed Loan Settlement Agreement") with Backbone Mining Solutions LLC ("Borrower"), with respect to a loan in the BlockFi Institutional Loan Portfolio.

PLEASE TAKE FURTHER NOTICE that the Debtors have provided certain additional required information with respect to the Proposed Loan Settlement Agreement to the applicable Notice Parties identified in the Settlement Procedures Order including (i) a copy of the applicable Proposed Loan Settlement Agreement and (ii) a form of order authorizing the entry into and performance under the Proposed Loan Settlement Agreement.

PLEASE TAKE FURTHER NOTICE that (i) the Notice Parties shall have ten (10) calendar days after receipt of this Notice of a Loan Settlement Agreement and (ii) any party-in-interest shall have ten (10) calendar days from the filing of this Notice on the bankruptcy docket

² Except as otherwise indicated herein, capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the Settlement Procedures Order.

to file an objection with the Court (with a copy to Debtors' counsel) opposing the entry of the Proposed Loan Settlement Agreement Order and approval of such Loan Settlement Agreement.

PLEASE TAKE FURTHER NOTICE that, upon satisfaction of the conditions in the Settlement Procedures Order, the Debtors will upload a proposed order approving the proposed Settlement Agreement for entry by the Court consistent with the terms of the Settlement Procedures Order.

Dated: January 27, 2023

/s/ Michael D. Sirota

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